

### **REMARKS**

In accordance with the foregoing, the Specification and the Claims are amended. Claims 6-10 are amended. Claims 1-20 are pending and under consideration.

No new matter has been added, and approval and entry of the foregoing specification and amended claims is respectfully requested.

In the final Office Action mailed August 27, 2003, the Examiner noted that claim 20 is pending and rejected claims 1-20. Applicants respectfully note that claims 1-20 are pending in the application. Claims 1-5, 7-10, 12-18, and 20 are amended, and, thus, **claims 1-20 remain pending** for reconsideration, which is respectfully requested.

### **OBJECTION TO THE SPECIFICATION**

The specification was amended, taking the Examiner's comments into consideration. In view of the amendments to the specification, it is respectfully submitted that the objection to the specification is overcome.

### **CLAIM REJECTIONS - 35 USC §112, CLAIMS 10 AND 11**

Applicants have amended claim 10 overcome the rejection by the Examiner. Specifically the claim has been amended to remove the "ensured according to" language as follows:

a plurality of vacant unit storage areas arranged in a matrix to have images inserted; and  
~~ensured according to processing target images; and~~

In view of the above, it is respectfully submitted that the rejection to claims 10 and 11 is overcome.

### **CLAIM REJECTIONS - 35 USC §102, CLAIMS 1-20 ARE REJECTED UNDER 35 USC §102(b) AS BEING ANTICIPATED BY CULLEN ET AL. (US PATENT NO. 5,732,230).**

Cullen discusses dividing and reading an oversized image into a plurality of image fragments using a scanner, displaying two or more of the image fragments on a display, and reproducing and outputting the oversize image by a user manipulating the image fragments on the display until a desired image has been pieced together.

Cullen et al. generally discusses drag and drop operations (see Cullen et al. col. 6, lines 11-23; FIG. 3, steps 112 and 114). That is, Cullen discusses that image fragments that are already on screen after a scanning operation may be moved around on the screen via drag and drop to different locations. One important aspect to note is that "[r]egardless of the shape of the

scan footprint [Cullen] *maintains an approximation to the footprint in the display* of the image fragment on the screen." (Cullen col. 5, lines 50-51, emphasis added).

In contrast to Cullen, the present invention creates a predefined matrix of blocks on the display that the images may be inserted into. The images may be fragments, but the images also may be whole pictures, such as a photograph as shown in FIG. 6. One benefit of this is that the user may choose a final image that is composed of a plurality of individual photographs or other images to create a new image composite *with different proportions* as shown in FIG. 10.

Independent claims 1 and 10 are amended to further emphasize the distinguishing features of the claimed present invention. In particular, claim 1 now recites, "a plurality of vacant blocks arranged in a matrix and each of the plurality of blocks may have a processing target image inserted from a source or any of the plurality of blocks may be left vacant." Claim 10 has been amended similarly. The Examiner has not provided express rationale to reject these claims 1, 10 and the associated dependent claims 2-9, 11, and 14-20 as the claims now recite elements that previously were only in the specification.

Cullen et al. discusses scanning in images in a number of different fragments that are displayed in separate portions of the display. (see Cullen col. 3, lines 4-24 and FIG. 5). However, Cullen et al. does not disclose what we believe to be one of the patentably distinguishing features of the present invention, that the images are insertable into what is essentially a matrix of predefined blocks on the display. (see 09/737,489 page 10, lines 6-12 as an example).

In view of the above, it is respectfully submitted that the rejection to claims 1-20 is overcome.

**CONCLUSION**

Claims 1-5, 7-10, 12-18, and 20 are amended to further emphasize the distinguishing features of the claimed present invention.

In view of the above, it is respectfully submitted that the application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,  
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